

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

|                               |   |                        |
|-------------------------------|---|------------------------|
| ARGELIA SOLITO,               | ) |                        |
|                               | ) |                        |
| Plaintiff,                    | ) |                        |
| v.                            | ) | Case 1:23-cv-03438-MLB |
|                               | ) |                        |
| SAM’S EAST, INC., JOHN DOE 1- | ) |                        |
| 2, ABC CORP., and XYZ CORP.,  | ) |                        |
|                               | ) |                        |
| Defendants.                   | ) |                        |

**NOTICE TO TAKE DEPOSITION OF ARGELIA SOLITO**

TO: Argelia Solito  
c/o Hung Q. Nguyen  
Law Office of Hung Q. Nguyen & Associates, LLC  
litigation@770goodlaw.com

You are hereby notified that on November 7, 2023, beginning at 10:00 a.m., counsel for Defendant will depose ARGELIA SOLITO at the law office of Drew, Eckl & Farnham, LLP, 303 Peachtree Street NE, Suite 3500, Atlanta, Georgia 30308. The deposition will be taken for the purpose of cross-examination, discovery, and all other purposes authorized or permitted by law, pursuant to Federal Rule of Civil Procedure 30(a)(1). The deposition will be recorded by stenographic means and will continue from day to day until completion.

This 19th day of September, 2023.

**DREW ECKL & FARNHAM, LLP**

/s/Michael L. Miller

Michael L. Miller

Georgia Bar No. 508011

Katherine I. Barton

Georgia Bar No. 882335

*Attorneys for Sam's East, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2023, I electronically filed Sam’s East, Inc.’s *Notice to Take Deposition of Argelia Solito* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Hung Q. Nguyen, Esq.  
Adam Klein, Esq.  
litigation@770goodlaw.com  
alex@770goodlaw.com  
adam@770goodlaw.com

This 19th day of September, 2023.

**DREW ECKL & FARNHAM, LLP**

/s/Michael L. Miller

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